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U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 14, 2022

MEMO ENDORSED

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Mohamed Rinsad Mohamed Mansoor v. Garland, et al.*, 22 Civ. 3083 (VEC)

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application for Naturalization (Form N-400). On behalf of the government, I write respectfully to request a thirty-day extension of the time to respond to the complaint (*i.e.*, from July 12, 2022, to August 11, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for June 24, 2022, be rescheduled for a date during the week of August 22, 2022, or thereafter (with a corresponding extension of time for the preconference submission). *See* ECF No. 2.

I respectfully request this extension because USCIS is reviewing the Form N-400 and determining next steps, which may include a Request for Evidence or other adjudicatory action that could render this action moot. This is the government’s first request for an extension of the deadline to respond to the complaint and an adjournment of the pretrial conference. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED.

Defendant's time to answer, move, or otherwise respond to the complaint is adjourned to **Thursday, August 11, 2022**. The initial pretrial conference, currently scheduled for Friday, June 24, 2022 at 2:00 P.M., is adjourned to **Friday, August 26, 2022 at 10:00 A.M.** Pre-conference submissions are due no later than **Thursday, August 18, 2022**. For the conference information and a description of the pre-conference submission requirements, the parties should consult the Court's order at docket entry 2.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

Date: June 14, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE